

LOWENSTEIN SANDLER PC

65 Livingston Avenue
Roseland, New Jersey 07068
Tel: (973) 597-2500
Fax: (973) 597-2478
Michael S. Etkin, Esq. (ME0570)
Paul Kizel, Esq. (PK4176)

-and-

1251 Avenue of the Americas, 18th Floor
New York, New York 10020
Tel: (212) 262-6700
Fax: (212) 262-7402

*Bankruptcy Counsel for Lehman Brothers Mortgage
Backed Securities Litigation Lead Plaintiff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**LEHMAN BROTHERS HOLDINGS INC., et
al.**

Debtors.

Chapter 11

Case No. 08-13555(JMP)

(Jointly Administered)

**OBJECTION OF LEHMAN BROTHERS MORTGAGE BACKED SECURITIES
LITIGATION LEAD PLAINTIFF TO THE MOTION OF THE AD HOC GROUP
OF LEHMAN BROTHERS CREDITORS PURSUANT TO SECTIONS 105(A)
AND 1109(B) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2019
AND 7026 TO ESTABLISH DISCLOSURE PROCEDURES**

**TO THE HONORABLE JAMES M. PECK,
UNITED STATES BANKRUPTCY JUDGE:**

1. Lehman Brothers Mortgage Backed Securities Litigation Lead Plaintiff (“Lead Plaintiff”), by and through its undersigned counsel, submits this objection (the “Objection”) to the *Motion of the Ad Hoc Group of Lehman Brothers Creditors Pursuant to Sections 105(a) and 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2019 and 7026 to Establish Disclosure Procedures (Doc. No. 17014)*

(the "Motion"). In support of this Objection, Lead Plaintiff respectfully states as follows:

2. Lead Plaintiff is a creditor in these chapter 11 cases and a participant in the plan discovery process. Many other parties have filed objections to the Motion (collectively, the "Disclosure Objections").

3. As set forth in the Disclosure Objections, the relief requested by the Motion is inconsistent with, and contrary to, the provisions of Bankruptcy Rule 2019. For this reason, and for the reasons set forth in the Disclosure Objections, Lead Plaintiff objects to the Motion.

WHEREFORE, Lead Plaintiff requests that this Court deny the Motion, and provide such further relief as is just.

Dated: June 8, 2011

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By: /s/ Paul Kizel

Michael S. Etkin, Esq.
Paul Kizel, Esq.
65 Livingston Avenue
Roseland, New Jersey 07068
Telephone: (973) 597-2500
Facsimile (973) 597-2400

and-

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18th Floor
New York, New York 10020
Tel: (212) 262-6700
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